

EXHIBIT D

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Attorney for Defendant, Stelios Coutsodontis

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEA TRADE MARITIME CORPORATION
and GEORGE PETERS,

Plaintiffs,

- v -

STELIOS COUTSODONTIS, FRANCESCA
ELENI COUTSODONTIS, GENERAL
MARITIME ENTERPRISES CORP., ATTIKA
INTERNATIONAL NAVIGATION SA, and
IASON SHIPPING LTD.,

Defendant.

CIVIL ACTION NO.: 09 CIV 00488 (BSJ)

ANSWER

Defendant, [CAPTAIN] STELIOS COUTSODONTIS (hereinafter '*Capt. Coutsodontis*'), as
and for his answer to Plaintiffs' SEA TRADE MARITIME CORPORATION (hereinafter '*Sea Trade*') and
GEORGE PETERS (hereinafter '*Peters*') Amended Complaint¹ herein, by his attorneys, POLES, TUBLIN,
STRATAKIS & GONZALEZ, LLP, alleges, upon information and belief, as follows:

¹ Capt. Coutsodontis is unaware of any prior Complaint which Plaintiffs Amended
Complaint amends.

143. Denies the allegations contained in Paragraph 143 of the Complaint.

AS AND FOR THE SECOND CAUSE OF ACTION

144. Capt. Coutasodontis repeats and realleges the responses contained in paragraphs 1 through 143 as if fully set forth herein.

145. Admits that Capt. Coutasodontis is a 50% owner of Sea Trade while denying the balance of the allegations contained in Paragraph 145 of the Complaint.

146. Denies the allegations contained in Paragraph 146 of the Complaint.

147. Denies the allegations contained in Paragraph 147 of the Complaint.

148. Denies the allegations contained in Paragraph 148 of the Complaint.

AS AND FOR THE THIRD CAUSE OF ACTION

149. Capt. Coutasodontis repeats and realleges the responses contained in paragraphs 1 through 148 as if fully set forth herein.

150. Admits the allegations contained in Paragraph 150 of the Complaint.

151. As to the allegations contained in Paragraph 151 of the Complaint, admits that, to the extent alleged, that Capt. Coutasodontis has fiduciary obligations as a shareholder and that he has fully complied with such obligations.

152. Denies the allegations contained in Paragraph 152 of the Complaint.

153. Denies the allegations contained in Paragraph 153 of the Complaint.

154. Denies the allegations contained in Paragraph 154 of the Complaint.

155. Denies the allegations contained in Paragraph 155 of the Complaint.

156. Denies the allegations contained in Paragraph 156 of the Complaint.

WHEREFORE, Capt. Coutsodontis prays:

- (i) That Plaintiffs' Complaint be dismissed with prejudice;
- (ii) That a judgment be entered in favor of Capt. Coutsodontis and against Plaintiffs;
- (2) that Capt. Coutsodontis be awarded interest, costs and attorneys' fees; and
- (3) that Capt. Coutsodontis be awarded such other and further relief as this Court may deem just and proper.

Dated: New York, New York
August 19, 2010

by: 

Scott R. Johnston (SJ 0179)
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